

**KENDRA M. MATTHEWS, OSB No. 965672**

kendra@boisematthews.com

**BRIDGET M. DONEGAN, OSB No. 103753**

bridget@boisematthews.com

**WHITNEY P. BOISE, OSB No. 851570**

whitney@boisematthews.com

**BOISE MATTHEWS DONEGAN LLP**

Fox Tower

805 S.W. Broadway, Suite 1900

Portland, OR 97205

Telephone: (503) 228-0487

Fax: (503) 227-5984

Of Attorneys for Defendant Bethany Mockerman

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**Eugene Division**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**BETHANY MOCKERMAN,**

Defendant.

Case No: **6:22-cr-00262-2-MC**

**DECLARATION IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
TEMPORARY RELEASE OF  
PASSPORT**

I, KENDRA M. MATTHEWS, hereby declare and say:

1. I am a partner at Boise Matthews Donegan LLP; our law firm is representing Ms. Mockerman in this case.

2. Ms. Mockerman's trial is scheduled for June 6, 2023.

//

3. Ms. Mockerman is released on conditions and is being supervised by United States Pretrial Services Officer Jeffrey Cox.

4. A family member (not co-defendant) has asked Ms. Mockerman to accompany her on a trip to visit another family member who is living abroad. Ms. Mockerman would not be paying for either the travel or accommodations on this trip. The defense has shared with the government and Mr. Cox with whom Ms. Mockerman hopes to travel, where they would be traveling and who she would be visiting. The travel arrangements, including the dates of travel, have not been made yet. If authorized, the trip would be completed before the trial date (June 6, 2023).

5. On February 2, 2023, United States Pretrial Services Officer Jeffrey Cox authorized counsel to report that his office has no objection to Ms. Mockerman being granted temporary custody of her passport so that she can go on this trip. Mr. Cox indicated that, provided the Court authorized the release of the passport for the express purpose of Ms. Mockerman going on this trip, he had no objection to coordinating the release/return of the passport directly with Ms. Mockerman upon her providing the full details of the travel, including airfare and accommodations information.

6. On February 7, 2023, Assistant United States Attorney Gavin W. Bruce authorized counsel to advise the Court that the government has no objection to Ms. Mockerman being granted temporary custody of her passport so that she can go on this trip.

I hereby declare under penalty of perjury that the above statements are true to the best of my knowledge and belief.

DATED this 7th day of February, 2023.

/s/ Kendra M. Matthews

KENDRA M. MATTHEWS

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION IN SUPPORT OF  
DEFENDANT'S MOTION FOR TEMPORARY RELEASE OF PASSPORT on the following  
attorneys by causing it to be electronically filed on the 7th day of February, 2023.

Gavin W. Bruce  
Assistant United States Attorney  
United States Attorney's Office  
Suite 600  
1000 S.W. Third Avenue  
Portland, OR 97204-2902  
[Gavin.Bruce@usdoj.gov](mailto:Gavin.Bruce@usdoj.gov)

BOISE MATTHEWS DONEGAN LLP

/s/ Kendra M. Matthews  
KENDRA M. MATTHEWS, OSB No. 965672  
(503) 228-0487  
Of Attorneys for Defendant Bethany Mockerman